# UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

	(
UNITED STATES OF AMERICA,  Plaintiff,	- : : :
-against-	: : Criminal No. 1:19-cr-10080-NMG
DAVID SIDOO, ET AL,	: :
Defendant.	:
	•

# NON-PARTY UNIVERSITY OF SOUTHERN CALIFORNIA'S ASSENTED-TO MOTION FOR LEAVE TO FILE SUR-REPLY REGARDING DEFENDANT JOHN WILSON'S MOTION FOR LEAVE TO FILE EXHIBIT IN THE <a href="PUBLIC RECORD">PUBLIC RECORD</a>

Nonparty University of Southern California ("USC") hereby moves this Honorable Court for leave to file a Sur-Reply Regarding Defendant John Wilson's Motion for Leave to File Exhibit in the Public Record. In support of this request, USC states that the two-page Sur-Reply, a copy of which is attached hereto as <a href="Exhibit A">Exhibit A</a>, is necessary to correct Defendant Wilson's mischaracterization of the agreed-upon Protective Order and the Exhibit in question, and believes it will assist the Court in its analysis of the issues.

# **CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

Undersigned counsel hereby certifies that he has conferred with counsel for Defendant John Wilson, who assents to this Motion.

Respectfully submitted, UNIVERSITY OF SOUTHERN CALIFORNIA, By its attorneys,

#### <u>/s/ Debra Wong Yang</u>

Debra Wong Yang (Admitted *Pro Hac Vice*)
Douglas M. Fuchs (Admitted *Pro Hac Vice*)
GIBSON DUNN & CRUTCHER LLP
333 South Grand Avenue
Los Angeles, CA 90071-3197
(213)229-7000
dwongyang@gibsondunn.com
dfuchs@gibsondunn.com

# /s/ Anthony E. Fuller

Anthony E. Fuller (BBO #633246)
William H. Kettlewell (BBO# 270320)
Elizabeth C. Pignatelli (BBO #677923)
HOGAN LOVELLS US LLP
125 High St., Suite 2010
Boston, MA 02110
(617) 371-1000
anthony.fuller@hoganlovells.com
bill.kettlewell@hoganlovells.com
elizabeth.pignatelli@hoganlovells.com

Dated: April 1, 2020

# **CERTIFICATE OF SERVICE**

I, hereby certify that this document filed through ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent those indicated as nonregistered participants on April 1, 2020.

/s/ Anthony E. Fuller
Anthony E. Fuller